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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JORGE RODRIGUEZ-MEDINA, and

JOSE MANUEL SANCHEZ-LOBO,

Defendants.

Case No.: 2:24-mj-00195-BNW

**Stipulation to Extend Deadlines to
Conduct Preliminary Hearing and
File Indictment (Third Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Jean N. Ripley, Assistant United States Attorney, counsel for the United States of America; Rene L. Valladares, Federal Public Defender, and LaRonda R. Martin, Assistant Federal Public Defender, counsel for defendant Jose Manuel Sanchez-Lobo; and Robert Draskovich, counsel for defendant Jorge Rodriguez-Medina, that the preliminary hearing in the above-captioned case, currently scheduled for March 13, 2024, at 4:00 p.m., be vacated and continued until a time convenient to the Court, but no earlier than 30 days from the date of the filing of this stipulation.

1 This request requires that the Court extend two deadlines: (1) that a preliminary
2 hearing be conducted within 14 days of a detained defendant's initial appearance, *see* Fed.
3 R. Crim. P. 5.1(c); and (2) that an information or indictment be filed within 30 days of a
4 defendant's arrest, *see* 18 U.S.C. § 3161(b).

5 This stipulation is entered into for the following reasons:

6 1. Federal Rule of Criminal Procedure Rule 5.1(d) provides that "[w]ith the
7 defendant's consent and upon a showing of good cause—taking into account the public
8 interest in the prompt disposition of criminal cases—a magistrate judge may extend the time
9 limits [for preliminary hearings] one or more times." Here, the parties need additional time
10 to consider whether the case can be resolved prior to indictment.

11 2. This continuance is not sought for the purposes of delay, but to allow the
12 parties an opportunity to examine the merits of this case and determine whether the case
13 can be resolved prior to indictment.

14 3. Defendants are not in custody and agree to the continuance.

15 4. Denial of this request could result in a miscarriage of justice, and the ends of
16 justice served by granting this request outweigh the best interest of the public and the
17 defendants in a speedy trial.

18 5. The additional time requested by this stipulation is excludable in computing

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the time within which indictment must be filed pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(b), and considering the factors under 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv).

DATED this 7th day of May, 2024.

Respectfully submitted,

JASON M. FRIERSON
United States Attorney

/s/ Laronda R. Martin
LARONDA R. MARTIN
Assistant Federal Public Defender
Counsel for Defendant Sanchez-Lobo

/s/ Jean N. Ripley
Jean N. Ripley
Assistant United States Attorney
Counsel for the United States

/s/ Robert Draskovich
Robert Draskovich, Esq.
Counsel for Defendant Rodriguez-Medina

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FINDINGS AND ORDER

Based on the pending Stipulation between the defense and the government, and good cause appearing therefore, the Court hereby finds that:

1. The parties desire to continue the preliminary hearing to facilitate pre-indictment resolution. The Court finds good cause to continue the hearing to allow the court additional time to decide whether to accept the plea.

2. Both counsel for the defendants and counsel for the government agree to the continuance.

3. Defendants are not in custody and agree to the continuance.

4. The continuance is not sought for the purposes of delay, but to allow the parties to reach a potential resolution before the government moves forward with further prosecution.

5. Denial of this request could result in a miscarriage of justice, and the ends of justice served by granting this request outweigh the best interest of the public and the defendants in a speedy trial.

